

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Linda Tirado

Court File No. 0:20-cv-01338
(JRT/ECW)

Plaintiff,

vs.

City of Minneapolis; Minneapolis Chief
of Police Medaria Arradondo *in his
official capacity*; Minneapolis Police
Lieutenant Robert Kroll, *in his official
capacity*; Minnesota Department of
Public Safety Commissioner John
Harrington, *in his official capacity*,
Minnesota State Patrol Colonel
Matthew Langer, *in his official capacity*;
and John Does 1-4, *in their official and
individual capacities*.

**STATE DEFENDANTS’
MOTION TO DISMISS
PLAINTIFF’S COMPLAINT**

Defendants.

Minnesota Department of Public Safety Commissioner John Harrington and
Minnesota State Patrol Colonel Matthew Langer (“State Defendants”) move the Court to
dismiss Plaintiff’s Complaint against them for lack of subject matter jurisdiction and
failure to state a claim upon which relief may be granted.

This motion is made pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6) and is based
upon the files, records, and proceedings herein, including the memorandum of law filed
and served herewith.

SIGNATURE ON FOLLOWING PAGE

Dated: July16, 2020

KEITH ELLISON
Attorney General
State of Minnesota

s/ Julianna F. Passe
KATHRYN IVERSON LANDRUM
(#0389424)

JULIANNA F. PASSE (#0397317)
Assistant Attorneys General

445 Minnesota Street, Suite 1400
St. Paul, Minnesota 55101-2131
(651) 757-1189 (Voice)
(651) 282-5832 (Fax)
kathryn.landrum@ag.state.mn.us
julianna.passe@ag.state.mn.us

ATTORNEYS FOR DEFENDANTS
MINNESOTA DEPARTMENT OF PUBLIC
SAFETY COMMISSIONER JOHN
HARRINGTON AND MINNESOTA STATE
PATROL COLONEL MATTHEW
LANGER, *IN THEIR OFFICAL*
CAPACITIES

|#4740682-v1